

United States District Court

SOUTHERN

DISTRICT OF

TEXAS

McAllen Division

UNITED STATES OF AMERICA

United States Courts Southern

District of Texas

V.

FILED

CRIMINAL COMPLAINT

Samuel Trevino

10/02/2022

Case Number: M- 22-1929-M

YOB: 1972

COC: United States

Nathan Ochsner, Clerk of Court

I the undersigned complainant, state the following is true and correct to the best of my knowledge and belief. On or about October 1, 2022 in Hidalgo County, in the Southern District of Texas defendant(s) did,

knowing or in reckless disregard of the fact that an alien has come to, entered, or remains in the United States in violation of law, transports, or moves or attempts to transport or move such alien within the United States by means of transportation or otherwise, in furtherance of such violation of law and brought the alien for the purpose of commercial advantage or private gain,

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(ii)
I further state that I am a Customs and Border Protection Officer and that this complaint is based on the following facts:

See Attachment "A"

Continued on the attached sheet and made a part of this complaint:

☒ Yes

☐ No

Approved By: Eliza Rodriguez

Submitted by reliable electronic means, sworn to and attested to telephonically per Fed. R. Cr. 4.1, and probable cause found on :

October 2, 2022 @ 2:46 p.m.

Date

Juan F. Alanis

U.S. Magistrate Judge

Name and Title of Judicial Officer

/s/ Juan R. Cienega

Signature of Complainant

Juan R. Cienega

Printed Name of Complainant

McAllen, Texas

City and State

Signature of Judicial Officer

Attachment A

On October 1, 2022, the defendant attempted to bring two undocumented non-citizen children (L.Y.C.C., age 16, and B.Y.A.L., age 8) illegally into the United States at the Hidalgo Port of Entry by claiming they were United States citizens. At pedestrian primary, the defendant claimed the children were his cousins and presented two Texas birth certificates for them. They were referred into secondary for further inspection after the children were unable to answer routine questions.

At secondary, further inspection revealed no relation between the children or the defendant. The defendant went on to admit that he knew the children were undocumented and that he used his family members' birth certificates to facilitate their illegal entry into the United States. He further stated a friend knows their fathers and told him to bring the girls to Houston. He agreed to transport the children by picking them up in a plaza in Reynosa, Mexico and bringing them to Houston, Texas through the Hidalgo Port of Entry. If successful, he was to be compensated \$1,200 dollars for each child once they arrived in Houston, Texas.

Database queries on both children revealed they did not have legal status to enter the United States.